

BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

SARAH ELIZABETH LACAMBRA
1730 Branstetter Court
Redding, CA 96001-4306

Registered Nurse License No. 548647

Respondent

Case No. 2007-224

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as it's Decision in the above entitled matter.

This Decision shall become effective on December 17, 2007.

IT IS SO ORDERED November 15, 2007.



President
Board of Registered Nursing
Department of Consumer Affairs
State of California

1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 ARTHUR D. TAGGART
Supervising Deputy Attorney General
3 JEFFREY M. PHILLIPS, State Bar No. 154990
Deputy Attorney General
4 California Department of Justice
1300 I Street, Suite 125
5 P.O. Box 944255
Sacramento, CA 94244-2550
6 Telephone: (916) 324-6292
Facsimile: (916) 327-8643
7

8 Attorneys for Complainant

9 **BEFORE THE**
BOARD OF REGISTERED NURSING
10 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

11
12 In the Matter of the Accusation Against:

13 SARAH E. LACAMBRA
1730 Branstetter Circle
14 Redding, CA 96007

15 Registered Nursing License No. 548647

16 Respondent.
17

Case No. 2007-224

OAH No. 2007-224

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

18 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the
19 above-entitled proceedings that the following matters are true:

20 PARTIES

21 1. Ruth Ann Terry, M.P.H, R.N (Complainant) is the Executive Officer of
22 the Board of Registered Nursing (Board). She brought this action solely in her official capacity
23 and is represented in this matter by Edmund G. Brown Jr., Attorney General of the State of
24 California, by Jeffrey M. Phillips, Deputy Attorney General.

25 2. Sarah E. LaCambra (Respondent) is representing herself in this proceeding
26 and has chosen not to exercise her right to be represented by counsel.

27 3. On or about October 7, 1998, the Board of Registered Nursing issued
28 Registered Nursing License No. 548647 to Sarah E. Lacambra. The Nursing License was in full

1 force and effect at all times relevant to the charges brought in Accusation No. 2007-224 and will
2 expire on March 31, 2008, unless renewed.

3 JURISDICTION

4 4. Accusation No. 2007-224 was filed before the Board of Registered
5 Nursing, and is currently pending against Respondent. The Accusation and all other statutorily
6 required documents were properly served on Respondent on February 27, 2007. Respondent
7 timely filed her Notice of Defense contesting the Accusation. A copy of Accusation No.
8 2007-224 is attached as exhibit A and incorporated herein by reference.

9 ADVISEMENT AND WAIVERS

10 5. Respondent has carefully read, and understands the charges and allegations
11 in Accusation No. 2007-224. Respondent has also carefully read, and fully understands the
12 effects of this Stipulated Settlement and Disciplinary Order.

13 6. Respondent is fully aware of her legal rights in this matter, including the
14 right to a hearing on the charges and allegations in the Accusation; the right to be represented by
15 counsel at her own expense; the right to confront and cross-examine the witnesses against her;
16 the right to present evidence and to testify on her own behalf; the right to the issuance of
17 subpoenas to compel the attendance of witnesses and the production of documents; the right to
18 reconsideration and court review of an adverse decision; and all other rights accorded by the
19 California Administrative Procedure Act and other applicable laws.

20 7. Respondent voluntarily, knowingly, and intelligently waives and gives up
21 each and every right set forth above.

22 CULPABILITY

23 8. Respondent admits the truth of each and every charge and allegation in
24 Accusation No. 2007-224.

25 9. Respondent agrees that her Registered Nursing License is subject to
26 discipline and she agrees to be bound by the Board's imposition of discipline as set forth in the
27 Disciplinary Order below.

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1 Disciplinary Order:

2 IT IS HEREBY ORDERED that Registered Nursing License No. 548647 issued
3 to Respondent Sarah E. Lacambra (Respondent) is revoked. However, the revocation is stayed
4 and Respondent is placed on probation for three (3) years on the following terms and conditions.

5 **Severability Clause.** Each condition of probation contained herein is a separate
6 and distinct condition. If any condition of this Order, or any application thereof, is declared
7 unenforceable in whole, in part, or to any extent, the remainder of this Order, and all other
8 applications thereof, shall not be affected. Each condition of this Order shall separately be valid
9 and enforceable to the fullest extent permitted by law.

10 1. **Obey All Laws.** Respondent shall obey all federal, state and local laws.
11 A full and detailed account of any and all violations of law shall be reported by Respondent to
12 the Board in writing within seventy-two (72) hours of occurrence. To permit monitoring of
13 compliance with this condition, Respondent shall submit completed fingerprint forms and
14 fingerprint fees within 45 days of the effective date of the decision, unless previously submitted
15 as part of the licensure application process.

16 **Criminal Court Orders:** If Respondent is under criminal court orders, including
17 probation or parole, and the order is violated, this shall be deemed a violation of these probation
18 conditions, and may result in the filing of an accusation and/or petition to revoke probation.

19 2. **Comply with the Board's Probation Program.** Respondent shall fully
20 comply with the conditions of the Probation Program established by the Board and cooperate
21 with representatives of the Board in its monitoring and investigation of the Respondent's
22 compliance with the Board's Probation Program. Respondent shall inform the Board in writing
23 within no more than 15 days of any address change and shall at all times maintain an active,
24 current license status with the Board, including during any period of suspension.

25 Upon successful completion of probation, Respondent's license shall be fully
26 restored.

27 3. **Report in Person.** Respondent, during the period of probation, shall
28 appear in person at interviews/meetings as directed by the Board or its designated

1 representatives.

2 4. **Residency, Practice, or Licensure Outside of State.** Periods of
3 residency or practice as a registered nurse outside of California shall not apply toward a reduction
4 of this probation time period. Respondent's probation is tolled, if and when she resides outside
5 of California. Respondent must provide written notice to the Board within 15 days of any change
6 of residency or practice outside the state, and within 30 days prior to re-establishing residency or
7 returning to practice in this state.

8 Respondent shall provide a list of all states and territories where she has ever been
9 licensed as a registered nurse, vocational nurse, or practical nurse. Respondent shall further
10 provide information regarding the status of each license and any changes in such license status
11 during the term of probation. Respondent shall inform the Board if she applies for or obtains a
12 new nursing license during the term of probation.

13 5. **Submit Written Reports.** Respondent, during the period of probation,
14 shall submit or cause to be submitted such written reports/declarations and verification of actions
15 under penalty of perjury, as required by the Board. These reports/declarations shall contain
16 statements relative to Respondent's compliance with all the conditions of the Board's Probation
17 Program. Respondent shall immediately execute all release of information forms as may be
18 required by the Board or its representatives.

19 Respondent shall provide a copy of this Decision to the nursing regulatory agency
20 in every state and territory in which she has a registered nurse license.

21 6. **Function as a Registered Nurse.** Respondent, during the period of
22 probation, shall engage in the practice of registered nursing in California for a minimum of 24
23 hours per week for 6 consecutive months or as determined by the Board.

24 For purposes of compliance with the section, "engage in the practice of registered
25 nursing" may include, when approved by the Board, volunteer work as a registered nurse, or
26 work in any non-direct patient care position that requires licensure as a registered nurse.

27 The Board may require that advanced practice nurses engage in advanced practice
28 nursing for a minimum of 24 hours per week for 6 consecutive months or as determined by the

1 Board.

2 If Respondent has not complied with this condition during the probationary term,
3 and Respondent has presented sufficient documentation of her good faith efforts to comply with
4 this condition, and if no other conditions have been violated, the Board, in its discretion, may
5 grant an extension of Respondent's probation period up to one year without further hearing in
6 order to comply with this condition. During the one year extension, all original conditions of
7 probation shall apply.

8 7. **Employment Approval and Reporting Requirements.** Respondent
9 shall obtain prior approval from the Board before commencing or continuing any employment,
10 paid or voluntary, as a registered nurse. Respondent shall cause to be submitted to the Board all
11 performance evaluations and other employment related reports as a registered nurse upon request
12 of the Board.

13 Respondent shall provide a copy of this Decision to her employer and immediate
14 supervisors prior to commencement of any nursing or other health care related employment.

15 In addition to the above, Respondent shall notify the Board in writing within
16 seventy-two (72) hours after she obtains any nursing or other health care related employment.
17 Respondent shall notify the Board in writing within seventy-two (72) hours after she is
18 terminated or separated, regardless of cause, from any nursing, or other health care related
19 employment with a full explanation of the circumstances surrounding the termination or
20 separation.

21 8. **Supervision.** Respondent shall obtain prior approval from the Board
22 regarding Respondent's level of supervision and/or collaboration before commencing or
23 continuing any employment as a registered nurse, or education and training that includes patient
24 care.

25 Respondent shall practice only under the direct supervision of a registered nurse
26 in good standing (no current discipline) with the Board of Registered Nursing, unless alternative
27 methods of supervision and/or collaboration (e.g., with an advanced practice nurse or physician)
28 are approved.

Respondent's level of supervision and/or collaboration may include, but is not limited to the following:

(a) Maximum - The individual providing supervision and/or collaboration is present in the patient care area or in any other work setting at all times.

(b) Moderate - The individual providing supervision and/or collaboration is in the patient care unit or in any other work setting at least half the hours Respondent works.

(c) Minimum - The individual providing supervision and/or collaboration has person-to-person communication with Respondent at least twice during each shift worked.

(d) Home Health Care - If Respondent is approved to work in the home health care setting, the individual providing supervision and/or collaboration shall have person-to-person communication with Respondent as required by the Board each work day. Respondent shall maintain telephone or other telecommunication contact with the individual providing supervision and/or collaboration as required by the Board during each work day. The individual providing supervision and/or collaboration shall conduct, as required by the Board, periodic, on-site visits to patients' homes visited by Respondent with or without Respondent present.

9. Employment Limitations. Respondent shall not work for a nurse's registry, in any private duty position as a registered nurse, a temporary nurse placement agency, a traveling nurse, or for an in-house nursing pool.

Respondent shall not work for a licensed home health agency as a visiting nurse unless the registered nursing supervision and other protections for home visits have been approved by the Board. Respondent shall not work in any other registered nursing occupation where home visits are required.

Respondent shall not work in any health care setting as a supervisor of registered nurses. The Board may additionally restrict Respondent from supervising licensed vocational nurses and/or unlicensed assistive personnel on a case-by-case basis.

Respondent shall not work as a faculty member in an approved school of nursing or as an instructor in a Board approved continuing education program.

Respondent shall work only on a regularly assigned, identified and predetermined

1 worksite(s) and shall not work in a float capacity.

2 If Respondent is working or intends to work in excess of 40 hours per week, the
3 Board may request documentation to determine whether there should be restrictions on the hours
4 of work.

5 10. **Complete a Nursing Course(s).** Respondent, at her own expense,
6 shall enroll and successfully complete a course(s) relevant to the practice of registered nursing no
7 later than six months prior to the end of her probationary term.

8 Respondent shall obtain prior approval from the Board before enrolling in the
9 course(s). Respondent shall submit to the Board the original transcripts or certificates of
10 completion for the above required course(s). The Board shall return the original documents to
11 Respondent after photocopying them for its records.

12 11. **Cost Recovery.** Respondent shall pay to the Board costs associated
13 with its investigation and enforcement pursuant to Business and Professions Code section 125.3
14 in the amount of \$1,587.00. Respondent shall be permitted to pay these costs in a payment plan
15 approved by the Board, with payments to be completed no later than three months prior to the
16 end of the probation term.

17 If Respondent has not complied with this condition during the probationary term,
18 and Respondent has presented sufficient documentation of her good faith efforts to comply with
19 this condition, and if no other conditions have been violated, the Board, in its discretion, may
20 grant an extension of Respondent's probation period up to one year without further hearing in
21 order to comply with this condition. During the one year extension, all original conditions of
22 probation will apply.

23 12. **Violation of Probation.** If Respondent violates the conditions of her
24 probation, the Board after giving Respondent notice and an opportunity to be heard, may set
25 aside the stay order and impose the stayed discipline (revocation/suspension) of Respondent's
26 license.

27 If during the period of probation, an accusation or petition to revoke probation has been
28 filed against Respondent's license or the Attorney General's Office has been requested to

1 prepare an accusation or petition to revoke probation against Respondent's license, the
2 probationary period shall automatically be extended and shall not expire until the accusation or
3 petition has been acted upon by the Board.

4 13. **License Surrender.** During Respondent's term of probation, if she ceases
5 practicing due to retirement, health reasons or is otherwise unable to satisfy the conditions of
6 probation, Respondent may surrender her license to the Board. The Board reserves the right to
7 evaluate Respondent's request and to exercise its discretion whether to grant the request, or to
8 take any other action deemed appropriate and reasonable under the circumstances, without
9 further hearing. Upon formal acceptance of the tendered license and wall certificate, Respondent
10 will no longer be subject to the conditions of probation.

11 Surrender of Respondent's license shall be considered a disciplinary action and
12 shall become a part of Respondent's license history with the Board. A registered nurse whose
13 license has been surrendered may petition the Board for reinstatement no sooner than the
14 following minimum periods from the effective date of the disciplinary decision:

15 (1) Two years for reinstatement of a license that was surrendered for any
16 reason other than a mental or physical illness; or

17 (2) One year for a license surrendered for a mental or physical illness.

18 14. **Physical Examination.** Within 45 days of the effective date of this
19 Decision, Respondent, at her expense, shall have a licensed physician, nurse practitioner, or
20 physician assistant, who is approved by the Board before the assessment is performed, submit an
21 assessment of the Respondent's physical condition and capability to perform the duties of a
22 registered nurse. Such an assessment shall be submitted in a format acceptable to the Board. If
23 medically determined, a recommended treatment program will be instituted and followed by the
24 Respondent with the physician, nurse practitioner, or physician assistant providing written
25 reports to the Board on forms provided by the Board.

26 If Respondent is determined to be unable to practice safely as a registered nurse,
27 the licensed physician, nurse practitioner, or physician assistant making this determination shall
28 immediately notify the Board and Respondent by telephone, and the Board shall request that the

1 Attorney General's office prepare an accusation or petition to revoke probation. Respondent
2 shall immediately cease practice and shall not resume practice until notified by the Board.
3 During this period of suspension, Respondent shall not engage in any practice for which a license
4 issued by the Board is required until the Board has notified Respondent that a medical
5 determination permits Respondent to resume practice. This period of suspension will not apply
6 to the reduction of this probationary time period.

7 If Respondent fails to have the above assessment submitted to the Board within
8 the 45-day requirement, Respondent shall immediately cease practice and shall not resume
9 practice until notified by the Board. This period of suspension will not apply to the reduction of
10 this probationary time period. The Board may waive or postpone this suspension only if
11 significant, documented evidence of mitigation is provided. Such evidence must establish good
12 faith efforts by Respondent to obtain the assessment, and a specific date for compliance must be
13 provided. Only one such waiver or extension may be permitted.

14 **15. Participate in Treatment/Rehabilitation Program for Chemical**
15 **Dependence.** Respondent, at her expense, shall successfully complete during the probationary
16 period or shall have successfully completed prior to commencement of probation a Board-
17 approved treatment/rehabilitation program of at least six months duration. As required, reports
18 shall be submitted by the program on forms provided by the Board. If Respondent has not
19 completed a Board-approved treatment/rehabilitation program prior to commencement of
20 probation, Respondent, within 45 days from the effective date of the decision, shall be enrolled in
21 a program. If a program is not successfully completed within the first nine months of probation,
22 the Board shall consider Respondent in violation of probation.

23 Based on Board recommendation, each week Respondent shall be required to
24 attend at least one, but no more than five 12-step recovery meetings or equivalent (e.g., Narcotics
25 Anonymous, Alcoholics Anonymous, etc.) and a nurse support group as approved and directed
26 by the Board. If a nurse support group is not available, an additional 12-step meeting or
27 equivalent shall be added. Respondent shall submit dated and signed documentation confirming
28 such attendance to the Board during the entire period of probation. Respondent shall continue

1 with the recovery plan recommended by the treatment/rehabilitation program or a licensed
2 mental health examiner and/or other ongoing recovery groups.

3 16. **Abstain from Use of Psychotropic (Mood-Altering) Drugs.** Respondent
4 shall completely abstain from the possession, injection or consumption by any route of all
5 controlled substances and all psychotropic (mood altering) drugs, including alcohol, except when
6 the same are ordered by a health care professional legally authorized to do so as part of
7 documented medical treatment. Respondent shall have sent to the Board, in writing and within
8 fourteen (14) days, by the prescribing health professional, a report identifying the medication,
9 dosage, the date the medication was prescribed, the Respondent's prognosis, the date the
10 medication will no longer be required, and the effect on the recovery plan, if appropriate.

11 Respondent shall identify for the Board a single physician, nurse practitioner or
12 physician assistant who shall be aware of Respondent's history of substance abuse and will
13 coordinate and monitor any prescriptions for Respondent for dangerous drugs, controlled
14 substances or mood-altering drugs. The coordinating physician, nurse practitioner, or physician
15 assistant shall report to the Board on a quarterly basis Respondent's compliance with this
16 condition. If any substances considered addictive have been prescribed, the report shall identify a
17 program for the time limited use of any such substances.

18 The Board may require the single coordinating physician, nurse practitioner, or
19 physician assistant to be a specialist in addictive medicine, or to consult with a specialist in
20 addictive medicine.

21 17. **Submit to Tests and Samples.** Respondent, at her expense, shall
22 participate in a random, biological fluid testing or a drug screening program which the Board
23 approves. The length of time and frequency will be subject to approval by the Board.
24 Respondent is responsible for keeping the Board informed of Respondent's current telephone
25 number at all times. Respondent shall also ensure that messages may be left at the telephone
26 number when she is not available and ensure that reports are submitted directly by the testing
27 agency to the Board, as directed. Any confirmed positive finding shall be reported immediately
28 to the Board by the program and Respondent shall be considered in violation of probation.

1 In addition, Respondent, at any time during the period of probation, shall fully
2 cooperate with the Board or any of its representatives, and shall, when requested, submit to such
3 tests and samples as the Board or its representatives may require for the detection of alcohol,
4 narcotics, hypnotics, dangerous drugs, or other controlled substances.

5 If Respondent has a positive drug screen for any substance not legally authorized
6 and not reported to the coordinating physician, nurse practitioner, or physician assistant, and the
7 Board files a petition to revoke probation or an accusation, the Board may suspend Respondent
8 from practice pending the final decision on the petition to revoke probation or the accusation.
9 This period of suspension will not apply to the reduction of this probationary time period.

10 If Respondent fails to participate in a random, biological fluid testing or drug
11 screening program within the specified time frame, Respondent shall immediately cease practice
12 and shall not resume practice until notified by the Board. After taking into account documented
13 evidence of mitigation, if the Board files a petition to revoke probation or an accusation, the
14 Board may suspend Respondent from practice pending the final decision on the petition to
15 revoke probation or the accusation. This period of suspension will not apply to the reduction of
16 this probationary time period.

17 **18. Mental Health Examination.** Respondent shall, within 45 days of the
18 effective date of this Decision, have a mental health examination including psychological testing
19 as appropriate to determine her capability to perform the duties of a registered nurse. The
20 examination will be performed by a psychiatrist, psychologist or other licensed mental health
21 practitioner approved by the Board. The examining mental health practitioner will submit a
22 written report of that assessment and recommendations to the Board. All costs are the
23 responsibility of Respondent. Recommendations for treatment, therapy or counseling made as a
24 result of the mental health examination will be instituted and followed by Respondent.

25 If Respondent is determined to be unable to practice safely as a registered nurse,
26 the licensed mental health care practitioner making this determination shall immediately notify
27 the Board and Respondent by telephone, and the Board shall request that the Attorney General's
28 office prepare an accusation or petition to revoke probation. Respondent shall immediately cease

practice and may not resume practice until notified by the Board. During this period of suspension, Respondent shall not engage in any practice for which a license issued by the Board is required, until the Board has notified Respondent that a mental health determination permits Respondent to resume practice. This period of suspension will not apply to the reduction of this probationary time period.

If Respondent fails to have the above assessment submitted to the Board within the 45-day requirement, Respondent shall immediately cease practice and shall not resume practice until notified by the Board. This period of suspension will not apply to the reduction of this probationary time period. The Board may waive or postpone this suspension only if significant, documented evidence of mitigation is provided. Such evidence must establish good faith efforts by Respondent to obtain the assessment, and a specific date for compliance must be provided. Only one such waiver or extension may be permitted.

19. **Therapy or Counseling Program.** Respondent, at her expense, shall participate in an on-going counseling program until such time as the Board releases her from this requirement and only upon the recommendation of the counselor. Written progress reports from the counselor will be required at various intervals.

ACCEPTANCE

I have carefully read the Stipulated Settlement and Disciplinary Order. I understand the stipulation and the effect it will have on my Registered Nursing License. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Registered Nursing.

DATED: 8/14/07

Sarah E. Lacambra
SARAH E. LACAMBRA (Respondent)

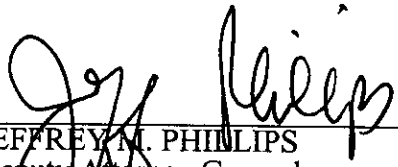
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ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Registered Nursing.

DATED: 9/10/07

EDMUND G. BROWN JR., Attorney General
of the State of California



JEFFREY M. PHILLIPS
Deputy Attorney General
Attorneys for Complainant

DOJ Matter ID: SA2006101477
stip.wpd

Exhibit A
Accusation No. 2007-224

1 EDMUND G. BROWN JR., Attorney General
of the State of California
2 ARTHUR D. TAGGART
Supervising Deputy Attorney General
3 JEFFREY M. PHILLIPS, State Bar No. 154990
Deputy Attorney General
4 California Department of Justice
1300 I Street, Suite 125
5 P.O. Box 944255
Sacramento, CA 94244-2550
6 Telephone: (916) 324-6292
Facsimile: (916) 322-8288

7 Attorneys for Complainant
8

9 **BEFORE THE**
10 **BOARD OF REGISTERED NURSING**
11 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

12 In the Matter of the Accusation Against:

Case No. 2007-224

13 **SARAH ELIZABETH LACAMBRA, AKA**
14 **SARAH ELIZABETH NELSON**

15 1730 Branstetter Circle
Redding, California 96007

16 Registered Nurse License No. 548647

17 Respondent.

A C C U S A T I O N

18 Ruth Ann Terry, M.P.H., R.N. ("Complainant") alleges:

19 **PARTIES**

20 1. Complainant brings this Accusation solely in her official capacity as the
21 Executive Officer of the Board of Registered Nursing ("Board"), Department of Consumer
22 Affairs.

23 **Registered Nurse License**

24 2. On or about October 7, 1998, the Board issued Registered Nurse License
25 Number 548647 to Sarah Elizabeth Lacambra, also known as Sarah Elizabeth Nelson
26 ("Respondent"). The registered nurse license was in full force and effect at all times relevant to
27 the charges brought herein and will expire on March 31, 2008, unless renewed.

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1 may result in termination of the registered nurse's participation in a program. The
2 name and license number of a registered nurse who is terminated for any reason,
3 other than successful completion, shall be reported to the board's enforcement
4 program.

5 (b) If a committee determines that a registered nurse, who is denied
6 admission into the program or terminated from the program, presents a threat to
7 the public or his or her own health and safety, the committee shall report the name
8 and license number, along with a copy of all diversion records for that registered
9 nurse, to the board's enforcement program. The board may use any of the records
10 it receives under this subdivision in any disciplinary proceeding.

11 **COST RECOVERY**

12 8. Code section 125.3 provides, in pertinent part, that the Board may request
13 the administrative law judge to direct a licensee found to have committed a violation or
14 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation
15 and enforcement of the case.

16 9. **DRUG**

17 "Amphetamine" is a Schedule II controlled substance as designated by
18 Health and Safety Code section 11055, subdivision (d)(1).

19 "Morphine" is a Schedule II controlled substance as designated by Health
20 and Safety Code section 11055, subdivision (b)(1)(M).

21 **FIRST CAUSE FOR DISCIPLINE**

22 **(Criminal Conviction)**

23 10. Respondent is subject to disciplinary action under Code section 2761,
24 subdivision (f), in that on November 20, 2003, in the case of *People vs. Sarah Elizabeth*
25 *Lacambra* (Sup. Ct. Cty of Shasta, 2003, Case No. 03F8160), Respondent was convicted by the
26 court on her plea of guilty of a violation of Health and Safety Code section 11350, subdivision
27 (a) (possession of Morphine). Such conduct is substantially related to the qualifications,
28 functions or duties of a licensed registered nurse.

29 **SECOND CAUSE FOR DISCIPLINE**

30 **(Conviction of a Crime Involving a Controlled Substance)**

31 11. Respondent has subjected her licenses to discipline under Code section
32 2761, subdivision (a), on the grounds of unprofessional conduct as defined in section 2762,

subdivision (c), of that Code, in that on or about November 20, 2003, Respondent was convicted of a crime involving a controlled substance, as more particularly set forth in paragraph 10, above.

THIRD CAUSE FOR DISCIPLINE

(Obtain and Possess a Controlled Substance in Violation of Law, and Self-Administration)

12. Respondent is subject to disciplinary action under Code section 2761, subdivision (a), on the grounds of unprofessional conduct, as defined in Code section 2762, subdivision (a), in that while on licensed as a registered nurse and employed with Shasta Community Health Center, Respondent committed acts, as follows:

a. On or about October 4, 2003, Respondent obtained Morphine, a controlled substance, by fraud, deceit, misrepresentation or subterfuge by taking the drug from hospital supplies in violation of Health and Safety Code section 11173, subdivision (a).

b. In or about October 2003, Respondent possessed Morphine, a controlled substance, in violation of Code section 4060.

c. In or about October 2003, Respondent self-administered Morphine, a controlled substance, without a lawful prescription.

d. On or about November 15, 2005, Respondent self-administered Amphetamine, a controlled substance, without a lawful prescription.

OTHER MATTERS

On or about April 4, 2006, Respondent was terminated from the Board's Diversion Program as a Public Safety Threat.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:


1. Revoking or suspending Registered Nurse License Number 548647, issued to Sarah Elizabeth Lacambra, also known as Sarah Elizabeth Nelson;

2. Ordering Sarah Elizabeth Lacambra, also known as Sarah Elizabeth Nelson to pay the Board of Registered Nursing the reasonable costs of the investigation and

1 enforcement of this case, pursuant to Code section 125.3; and,

2 3. Taking such other and further action as deemed necessary and proper.

3
4 DATED: 2/22/07

5 
6 RUTH ANN TERRY, M.P.H., R.N.
7 Executive Officer
8 Board of Registered Nursing
9 Department of Consumer Affairs
10 State of California
11 Complainant
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25 03579110-SA2006101477
26 Lacambra revised accusation.wpd
27 (11/02/06)
28